

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Request by Pima County, Arizona	)	DA Docket No. 11-1189
For Waiver of the Commission's Rules to Extend the	)	
Deadline for Transition to Narrowband Operations	)	
in the 150-174 MHz and 421-512 MHz bands	)	

**REQUEST FOR TEMPORARY WAIVER**

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## **REQUEST FOR TEMPORARY WAIVER**

Pursuant to Section 47 C.F.R. § 1.925(b)(3), and the guidelines issued in the Public Notice, DA-11-1189, Pima County, Arizona respectfully submits this Request for Temporary Waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands to permit specific participants of the Pima County Wireless Integrated Network Project to transition from their legacy VHF/UHF systems to a new regional 800 MHz public safety voice radio network.

Granting the requested waiver would allow the PCWN Partners to apply their human and fiscal resources towards deployment of a single countywide 800 MHz public safety voice radio network, instead of upgrades to legacy systems that would only provide short term benefit. This request serves the public interest and is consistent with the Commission's goals.

Pima County and its partners, seek a waiver of the Commission's rules and a grant of authorization to continue VHF/UHF wideband operation until July 1, 2014. The amount of time for which a waiver is requested is no more than is reasonably necessary to complete the construction of the new regional radio network. This waiver would prevent unduly burdensome efforts and cost to replace equipment that will not be used after July 1, 2014.

For the past several years, Pima County has funded and is deploying a mission-critical P25 800 MHz public safety voice radio network that will combine the majority of county radio resources into a single interoperable 800 MHz voice radio network.

The PCWIN project is primarily funded through a \$92 million Pima County general obligation capital improvement bond approved by Pima County voters in 2004. The Project is authorized by Pima County Ordinance No. 2004-18. The funding for this project is subject to oversight of the Pima County Citizen's Bond Advisory Committee and the Pima County Board of Supervisors. The PCWIN Executive Management Committee (EMC) was appointed by the



Board of Supervisors to oversee project implementation. Construction on this multi-year project began in 2010 and is expected to be completed in 2013 with testing and cutover to take place in early 2014. A high level schedule of implementation tasks is attached as Exhibit A.

The PCWIN project has two primary objectives: (1) replace disparate VHF and UHF radio systems with the implementation of a modern, state-of-the art, 800 MHz countywide regional interoperable public safety communications system, and (2) construction of a regional emergency communications and operations center.

The PCWIN voice radio network will serve a population of almost a million residents and over 300,000 households living in an area of approximately 9200 square miles, which is only slightly smaller than the entire State of Maryland. The 29 PCWIN partners currently operate a mixture of VHF, UHF and 800 MHz voice radio systems. The PCWIN project will replace most existing systems with a single countywide 26 site 800 MHz trunked radio system. This shared system will be connected to nine separate dispatch centers with ten separate 9-1-1 Public Safety Answering Points (PSAPS).

The PCWIN network partners consist of the agencies empowered by Pima County Ordinance 2004-18. The partner agencies are listed Exhibit B:

Some of the partner jurisdictions have relied on the availability of the new regional communications network to avoid the need to narrowband obsolete equipment that will not be used after communications services are transitioned to the new network. Unfortunately, and despite the community's best efforts, the new network will not be available until early 2014. The PCWIN Executive Management Committee directed staff to prepare a Regional Request for Temporary Waiver on behalf of any PCWIN participant agencies that were counting on the PCWIN project to provide a solution to their narrowbanding requirements. The County surveyed the twenty-nine PCWIN Participant agencies to determine their need to participate in this waiver



application. Those agencies that indicated a lack of resources to narrowband current equipment as an interim measure were identified as participants in this request. Six agencies were identified: Mt. Lemmon Fire District, South Tucson Police Department, South Tucson Fire Department, Tucson Police Department, Tucson Fire Department, and Pima County on behalf of the Ajo-Gibson Volunteer Fire Department and Why Fire District. The agencies wishing to participate in a waiver request were asked to complete a survey responding to the specific points of information included in the guidelines issued in the Public Notice. The submittals from each agency, including a list of the VHF/UHF licenses applicable to this Waiver Request are attached at Exhibit C. The exhibits include a description of licenses that are expected to be relinquished by the agencies after they complete their transition to the PCWIN communications network.

It is critical that the PCWIN participants identified herein be able to maintain their existing wideband VHF/UHF operations during the transition to the PCWIN communications network, and therefore, Pima County requests an extension of the deadline for transition to narrowband operations until July 1, 2014, on their behalf.

As outlined in the guidelines issued in the Public Notice, DA-11-1189, Pima County is providing the following information to address relevant factors in assessing that the Commission's waiver standard under Section 1.925 has been met.

**1. Steps already taken to plan for, initiate, and complete the transition to narrowband operations:**

Since 2004, Pima County has been involved in a multi-year project to consolidate disparate Public Safety radio systems into a regional 800MHz P25 interoperable system. In April 2009, Pima County entered into a contract with Motorola for the new voice radio system. Infrastructure for the new system will undergo factory acceptance testing in June 2012. Pima County has also contracted with Network Infrastructure Corporation to provide a backhaul



microwave communications network to support the Motorola voice radio system. The microwave equipment has been received at a local staging facility and is currently in the factory acceptance testing process. Pima County has been making communications site facility improvements over the past two years. These efforts are ongoing, but are scheduled to be completed in January 2013. Installation of the microwave equipment will commence in March.

**2. System size and complexity:**

When fully implemented, the new communications network will consist of a 26 site 800 MHz trunked radio system with three simulcast cells. This shared system will be connected to nine separate dispatch centers supporting ten separate 9-1-1 Public Safety Answering Points. The backhaul communications network architecture integrates existing and new microwave and fiber communications assets for a SONET network with multiple microwave hops and redundant loop protection. This is a complex system.

**3. Whether system equipment is narrowband-capable or must be replaced or upgraded:**

There are four jurisdictions participating in this Request for Temporary Waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. The answer to this question is unique to each affected agency. Please refer to the answers to the questionnaires in Exhibit C. Generally, each agency possesses equipment that would need to be replaced or upgraded as an interim solution to transitioning to the PCWIN voice radio network. It is not in the public interest to make a capital investment in equipment that will only be used for a short period of time.

**4. Whether the licensee plans additional system upgrades or improvements in addition to converting to narrowband operation:**



Pima County plans to service the communications needs of a majority of the County's public safety service providers on the new 800MHz P25 system. Pima County has no plans to upgrade or improve the legacy systems of its partners. Many of the project partners intend to continue operating in the VHF/UHF bands in the future and have; therefore, taken steps to come into compliance with the narrowbanding requirements. This is not the case with the agencies represented by this application.

**5. Funding sources, including whether the licensee's budget requires government approval or a multi-year budget process:**

Pima County voters authorized the sale of \$92 million dollars in general obligation bonds to fund the PCWIN project; including the voice radio system and dispatch facilities. An additional \$10.5 million has been contributed to the project through various federal grant programs. The jurisdictions seeking a temporary waiver are not budgeted to upgrade or replace current equipment and do not wish to expend dollars on a temporary interim solution to PCWIN.

**6. Whether the licensee's narrowbanding schedule is affected by neighboring systems due to interoperability relationships or other interdependencies:**

Two interdependencies are noted.

- The request by the Pima County Sheriff's Department is made so that the department may continue to provide dispatch services for the Ajo-Gibson Volunteer Fire Department, Why Fire District, and Ajo Ambulance Company in Ajo, Arizona. Ajo is a small rural community approximately 130 miles west of the Tucson metropolitan area. Pima County is the licensee for a single VHF frequency on which dispatch services are provided. The County supports an obsolete repeater and base station to



communicate with the fire and EMS responders. The fire and EMS responders are not able to upgrade or replace the repeater, base station and legacy subscriber equipment at this time. The two fire agencies are participants in the PCWIN project, and it is possible that the ambulance company will also join the project. In any case, the County has a need to continue to operate their equipment until the PCWIN system is available to provide alternative communications capabilities.

- The South Tucson Police Department is dispatched by the Tucson Police Department, and is subject to the limitations of the City of Tucson communication systems. Because the City of Tucson is requesting a temporary waiver as part of this application, the City of South Tucson is doing the same.

**7. Plans to minimize the negative impact of extended wideband operations on co-channel and adjacent channel operations, including a description of the spectrum environment in the affected areas:**

The county does not foresee a negative impact of extended VHF/UHF wideband operations on co-channel and adjacent channel operations since the agencies are already coordinating with PCWIN for the transition to the new system.

**8. If the licensee plans to migrate to a non-VHF/UHF band (e.g., 700 MHz or 800 MHz), whether it will relinquish VHF/UHF spectrum once it has migrated and the amount of spectrum to be relinquished:**

The answer to this question is unique to each agency. Please refer to Exhibit C. The PCWIN voice radio system will initially use 800MHz spectrum exclusively. The PCWIN frequency plan has been submitted to Commission representatives for review with the 800MHz Rebanding Transition Administrator.



Pima County requests that the Commission grant the requested temporary waiver to allow the PCWIN partners sufficient time to transition to a countywide voice radio system.

To obtain a waiver of the Commission's rules, a petitioner must demonstrate either that: the underlying purpose of the rule(s) would not be served or would be frustrated by application to the present case, and that a grant of the waiver would be in the public interest; or (ii) in view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome, or contrary to the public interest, or the applicant has no reasonable alternative. An applicant seeking a waiver faces a high hurdle and must plead with particularity the facts and circumstances that warrant a waiver. Although a successful waiver petition needs to satisfy only one of the two tests, Pima County believes that it has demonstrated that this request satisfies both tests.

Under the first test, the waiver request should be granted if: (a) denying the use of the UHF/VHF spectrum, would not serve the underlying purposes of the Commission's plan, and (b) granting the waiver would be in the public interest. This waiver request easily meets both requirements.

The underlying purpose of the Commission's plans for narrowbanding is to create an environment that offers cooperation among public safety agencies to enhance service delivery to the public which is a primary objective of the PCWIN project.

Granting of this waiver would greatly serve the public interest and supports the Commission's goals of enhancing radio spectrum efficiency while promoting consolidation and interoperability among public safety radio users.

The unique circumstances for each of the individual petitioning agencies are described in the questionnaires attached as Exhibit C. Universally, the petitioners have no plans or budget to replace wideband equipment that will be decommissioned after they transition to the regional



network by July 1, 2014. In the case of the City of Tucson, costs to narrowband current public safety communications equipment is estimated at \$1.7M. Agency resources are best applied to the successful implementation of the regional network. New purchases to replace obsolete equipment for what would be a temporary solution would be unreasonable and contrary to the public interest.

### **CONCLUSION**

Pima County requests that the Commission grant a waiver that would allow the extension of time for the operations of existing non-narrowbanded VHF and UHF radio systems that support public safety dispatch communications for the Mt. Lemmon Fire District, South Tucson Police Department, South Tucson Fire Department, Tucson Police Department, Tucson Fire Department and the Pima County Sheriff's Department during the construction of the new PCWIN 800MHz regional radio system. The PCWIN partners have worked diligently and in good faith to transition their systems expeditiously; and believe the specific circumstances of this project warrant a temporary extension of the deadline. The amount of time for which a waiver is requested is no more than is reasonably necessary to complete the construction process. It is estimated the PCWIN partners will be transferred to the new system and it will be fully operational before July 1, 2014.

The majority of the PCWIN participant agencies operating legacy radio systems in the VHF/UHF bands are expected to meet the narrowbanding requirements by January 1, 2013 as they intend to continue to operate in those bands post implementation of the regional system.

Attached are cover letters from each agency requesting a waiver, along with their pertinent information and affected frequencies. In addition, Pima County has attached letters from PCWIN participant agencies in support of the extension request (Exhibit D).

Thank you for your consideration of this important Request for Temporary Waiver.



Respectfully submitted,



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# EXHIBIT A







ID	WBS	Phase	% Complete	Task Name	Duration	Start	Finish	2010				2011				2012				2013				2014					
								H2 '09		H1 '10		H2 '10		H1 '11		H2 '11		H1 '12		H2 '12		H1 '13		H2 '13		H1 '14		H2 '14	
								Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4			
504	MW.4.5.1.77	MW	0%	Keystone	18 days	Fri 3/9/12	Tue 4/3/12																						
552	MW.4.5.1.78	MW	0%	Arivaca	9 days	Fri 3/9/12	Wed 3/21/12																						
567	MW.4.5.1.79	MW	0%	Childs	9 days	Fri 3/9/12	Wed 3/21/12																						
566	MW.4.5.1.80	MW	0%	Haystack	8 days	Fri 3/23/12	Tue 4/3/12																						
607	MW.4.5.1.81	MW	0%	Beacon	10 days	Wed 3/28/12	Tue 4/10/12																						
646	MW.4.5.1.82	MW	0%	OVPD	10 days	Fri 3/9/12	Thu 3/22/12																						
685	MW.4.5.1.83	MW	0%	Library	8 days	Fri 3/9/12	Tue 3/20/12																						
708	MW.4.5.1.85	MW	0%	Swan - Bigelow (Link 6)	3 days	Thu 9/13/12	Mon 9/17/12																						
711	MW.4.5.1.86	MW	0%	Bigelow - Lemmon (Link 7)	3 days	Thu 9/13/12	Mon 9/17/12																						
714	MW.4.5.1.87	MW	0%	Lemmon - OVPD (Link 8)	3 days	Tue 3/20/12	Thu 3/22/12																						
717	MW.4.5.1.88	MW	0%	Keystone - PCSO (Link 9)	3 days	Wed 3/14/12	Mon 3/19/12																						
720	MW.4.5.1.89	MW	0%	Keystone - PSTA (Link 10)	3 days	Tue 3/20/12	Thu 3/22/12																						
723	MW.4.5.1.90	MW	0%	Keystone - Arivaca (Link 11)	3 days	Fri 3/23/12	Wed 3/28/12																						
726	MW.4.5.1.92	MW	0%	Haystack - PSTA (Link 12)	3 days	Thu 3/29/12	Mon 4/2/12																						
729	MW.4.5.1.93	MW	0%	Beacon - Walker (Link 13)	3 days	Fri 3/30/12	Tue 4/3/12																						
732	MW.4.5.1.94	MW	0%	Beacon - OVPD (Link 14)	3 days	Tue 4/3/12	Thu 4/5/12																						
735	MW.4.5.1.95	MW	0%	Beacon - Library (Link 15)	3 days	Thu 4/5/12	Mon 4/9/12																						
738	MW.4.5.1.96	MW	0%	OVPD - Golder (Link 16)	3 days	Fri 3/16/12	Tue 3/20/12																						
741	MW.4.5.1.100	MW	0%	Confidence	9 days	Tue 9/11/12	Fri 9/21/12																						
771	MW.4.5.1.101	MW	0%	Pascua	8 days	Thu 4/5/12	Mon 4/16/12																						
792	MW.4.5.1.102	MW	0%	TOIHS	0 days	Thu 3/8/12	Thu 3/8/12																						
813	MW.4.5.1.103	MW	0%	TOPD	0 days	Thu 3/8/12	Thu 3/8/12																						
852	MW.4.5.1.104	MW	0%	Jewek	0 days	Thu 3/8/12	Thu 3/8/12																						
861	MW.4.5.1.105	MW	0%	Kitt	0 days	Thu 3/8/12	Thu 3/8/12																						
921	MW.4.5.1.106	MW	0%	Confidence - Eagle (Link 17)	3 days	Thu 9/13/12	Mon 9/17/12																						
924	MW.4.5.1.107	MW	0%	Confidence - Jewek (Link 18)	3 days	Fri 3/9/12	Tue 3/13/12																						
927	MW.4.5.1.108	MW	0%	Pascua - PSTA (Link 19)	3 days	Wed 4/11/12	Fri 4/13/12																						
930	MW.4.5.1.109	MW	0%	TOIHS - TOPD (Link 20)	0 days	Thu 3/8/12	Thu 3/8/12																						
933	MW.4.5.1.110	MW	0%	TOPD - JEWEEK (Link 21)	0 days	Thu 3/8/12	Thu 3/8/12																						
936	MW.4.5.1.111	MW	0%	Jewek - Childs (Link 22)	0 days	Thu 3/15/12	Thu 3/15/12																						
939	MW.4.5.1.112	MW	0%	Kitt - Keystone (Link 23)	0 days	Thu 3/8/12	Thu 3/8/12																						
942	MW.4.5.1.113	MW	0%	Kitt - TOPD (Link 24)	0 days	Thu 3/8/12	Thu 3/8/12																						
945	MW.4.5.5	MW	0%	MW Installation and Optimization Complete	0 days	Mon 9/17/12	Mon 9/17/12																						
946	MW.4.5.4	MW	0%	Network Management System	20 days	Tue 9/25/12	Mon 10/22/12																						
952	MW.4.5.7	MW	0%	Punchlist Resolution	0 days	Mon 11/5/12	Mon 11/5/12																						
953	MW.4.7	MW	0%	System Testing	110 days	Tue 9/18/12	Mon 2/18/13																						
968	MW.4.8	MW	0%	Finalize	85 days	Tue 2/19/13	Mon 6/17/13																						
6	1.5	NI	48%	5-NI (Network Infrastructure)	791 days	Thu 3/25/10	Mon 4/15/13																						
1	NI.5	NI	48%	Network Infrastructure	791 days	Thu 3/25/10	Mon 4/15/13																						
2	NI.5.2	NI	100%	Design	78 days	Mon 5/2/11	Fri 8/19/11																						
26	NI.5.7	NI	41%	Equipment Procurement	503 days	Thu 3/25/10	Wed 3/7/12																						
36	NI.5.4	NI	0%	Installation	264.5 days	Thu 1/26/12	Wed 2/13/13																						
37	NI.5.4.1	NI	0%	11 Sites	258.5 days	Thu 1/26/12	Tue 2/5/13																						
38	NI.5.4.1.25	NI	0%	PECOC	2.5 days	Thu 10/4/12	Tue 10/9/12																						
46	NI.5.4.1.27	NI	0%	EAGLE	2.5 days	Fri 3/23/12	Tue 3/27/12																						
54	NI.5.4.1.28	NI	0%	UAPD	2.5 days	Tue 2/28/12	Thu 3/1/12																						
60	NI.5.4.1.29	NI	0%	WALKER	2.5 days	Fri 3/16/12	Tue 3/20/12																						
67	NI.5.4.1.30	NI	0%	PCCPD	2.5 days	Thu 1/26/12	Mon 1/30/12																						
74	NI.5.4.1.31	NI	0%	TPSC	2.5 days	Thu 3/22/12	Mon 3/26/12																						
81	NI.5.4.1.32	NI	0%	TFD17	2.5 days	Thu 3/22/12	Mon 3/26/12																						
88	NI.5.4.1.33	NI	0%	PSTA	2.5 days	Mon 4/2/12	Wed 4/4/12																						
95	NI.5.4.1.36	NI	0%	CHILDS	2.5 days	Fri 3/23/12	Tue 3/27/12																						
102	NI.5.4.1.37	NI	0%	KEYSTONE	2.5 days	Thu 4/5/12	Mon 4/9/12																						
109	NI.5.4.1.38	NI	0%	BIGELOW	2.5 days	Tue 9/25/12	Thu 9/27/12																						
116	NI.5.4.1.39	NI	0%	OVPD	2.5 days	Mon 3/26/12	Wed 3/28/12																						
123	NI.5.4.1.40	NI	0%	SWAN	2.5 days	Fri 3/23/12	Tue 3/27/12																						
130	NI.5.4.1.43	NI	0%	TOPD	0 days	Thu 3/8/12	Thu 3/8/12																						
137	NI.5.4.1.44	NI	0%	JEWEEK	0 days	Thu 3/8/12	Thu 3/8/12																						
144	NI.5.4.1.45	NI	0%	KITT	0 days	Thu 3/8/12	Thu 3/8/12																						
151	NI.5.4.1.46	NI	0%	CONFIDENCE	2.5 days	Tue 9/25/12	Thu 9/27/12																						
158	NI.5.4.1.47	NI	0%	TUMAMOC	2.5 days	Fri 2/1/13	Tue 2/5/13																						
164	NI.5.4.1.49	NI	0%	BEACON	2.5 days	Thu 4/12/12	Mon 4/16/12																						
174	NI.5.4.20	NI	0%	COT Transport Manager 9.1 test	5 days	Wed 2/6/13	Wed 2/13/13																						
175	NI.5.5	NI	0%	Test	37 days	Wed 2/6/13	Mon 4/1/13																						
181	NI.5.6	NI	0%	Finalize	10.5 days	Mon 4/1/13	Mon 4/15/13																						
7	1.6	VR	54%	6-VR (Voice Radio)	1178 days	Fri 10/2/09	Tue 4/8/14																						
1	VR.6	VR	54%	Voice Radio	1178 days	Fri 10/2/09	Tue 4/8/14																						
2	VR.6.2	VR	95%	Program Management Services	967 days	Fri 10/2/09	Mon 6/17/13																						
59	VR.6.3	VR	88%	Design	745 days	Thu 10/15/09	Wed 8/22/12																						
114	VR.6.4	VR	70%	Civil Review (Site Review)	733.5 days	Mon 4/19/10	Thu 2/7/13																						
282	VR.6.5	VR	97%	Procurement	766 days	Thu 12/10/09	Thu 11/15/12																						
351	VR.6.6	VR	0%	Manufacturing	305 days	Mon 7/4/11	Fri 8/31/12																						
360	VR.6.7	VR	66%	Staging	347 days	Thu 5/19/11	Fri 9/14/12																						
389	VR.6.8	VR	0%	Equipment Installation	232 days	Tue 9/4/12	Wed 7/24/13																						
390	VR.6.8.1	VR	0%	FNE at 27 Sites	173 days	Thu 11/1/12	Fri 7/12/13																						
391	VR.6.8.1.5	VR	0%	PECOC (22ND ST Master Site)	50 days	Thu 11/1/12	Wed 1/16/13																						
400	VR.6.8.1.15	VR	0%	TUMAMOC (Prime B) (Simulcast A&B Remote)	31 days	Fri 2/22/13	Mon 4/8/13																						
408	VR.6.8.1.22																												







# **EXHIBIT B**



**Pima County Wireless Integrated Network  
Pima County Ordinance No. 2004-18 Authorized Participant Agencies**

**Police and Emergency Services Agencies**

Oro Valley Police Department  
Pascua Yaqui Police Department  
Pima College Department of Public Safety  
Pima County Sheriff's Department  
Sahuarita Police Department  
South Tucson Police Department  
Tohono O'odham Tribal Police  
Tucson Police Department  
University of Arizona Police  
Pima County OEM & Homeland Security

**Fire Agencies**

Ajo/Gibson Volunteer Fire Department  
Arivaca Volunteer Fire Department  
Avra Valley Fire District  
Corona de Tucson Fire District  
Drexel Heights Fire District  
Elephant Head Volunteer Fire Department  
Golder Ranch Fire District  
Green Valley Fire District  
Helmet Peak Fire District  
Mt. Lemmon Fire District  
Northwest Fire District  
Pascua Pueblo Fire Department  
Picture Rocks Fire District  
Rincon Valley Fire District  
South Tucson Fire Department  
Three Points Fire District  
Tohono O'odham Fire Department  
Tucson Fire Department  
Why Fire District



# **EXHIBIT C**



# Mt. Lemmon Fire District

- Cover Letter
- UHF/VHF Narrowbanding  
Questionnaire
- FCC Radio Frequency  
Information





December 27, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Waiver request for temporary extension of deadline to narrowband existing VHF/UHF radio systems

The Mount Lemmon Fire District respectfully requests a waiver of FCC Rule Section 90.203(j) to be authorized a temporary extension of time to continue wideband operations on existing VHF and UHF radio systems. Our Fire District is part of a regional coordination plan and filing this request as one partner of the Pima County Wireless Integrated Network (PCWIN) coordinated waiver request. The amount of time for which a waiver is requested is no more than reasonably necessary to complete the move to the new regional 800 MHz PCWIN system.

By participating in the PCWIN project, the Mount Lemmon Fire District has committed to replacing its legacy VHF and UHF radio systems. Therefore, our Fire District is dependent on the project schedule and has no other reasonable alternative or additional resources to address narrowbanding for its legacy VHF/UHF systems. In view of the circumstances of this case, application of the narrowbanding rule would be unduly burdensome and contrary to the public interest. We believe a grant of this waiver request would be in the public interest since the intent of the PCWIN Project is to replace legacy systems with a single regional interoperable 800 MHz voice radio system, thereby satisfying the underlying purpose of the narrowbanding rule by promoting consolidation and spectrum efficiency.

Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until our Fire District is fully transitioned to the regional 800 MHz PCWIN system. If you have any questions or require additional information regarding this request, please feel free to contact me at (520)576-1201.

Sincerely,

Randy Ogden  
Fire Chief  
Mount Lemmon Fire District

13170 N. Oracle Control Rd.  
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(520) 576-1201  
(520) 576-3095 fax  
[www.Mtlemonfire.org](http://www.Mtlemonfire.org)



## UHF/VHF Narrowbanding Questionnaire

The Federal Communications Commission (FCC) has set January 1, 2013 as the deadline for all VHF and UHF Public Safety and Industrial/Business land mobile radio (LMR) systems in the 150-174 MHz and 421-512 MHz bands to migrate from 25 kHz channel bandwidth to 12.5 kHz or narrower technology. After January 1, 2013, licensees not operating at 12.5 kHz efficiency will be in violation of the FCC's rules and could be subject to FCC enforcement action, which may include admonishment, monetary fines, or loss of license.

Information about narrowbanding benefits, frequently asked questions, links to information and resources and other relevant information may be obtained at [www.fcc.gov/narrowbanding](http://www.fcc.gov/narrowbanding). Narrowbanding related questions may be submitted to the FCC at [narrowbanding@fcc.gov](mailto:narrowbanding@fcc.gov).

The PCWIN Executive Management Committee has directed PCWIN staff to prepare a regional request for waiver to defer the need to narrowband frequencies and equipment for those agencies that will abandon the use of UHF/VHF spectrum licenses and equipment after PCWIN systems are cutover; currently scheduled for first quarter of calendar year 2014. If your agency will continue to operate on your UHF/VHF licenses after PCWIN cutover, you are required to narrowband your solutions prior to the January 1, 2013 deadline. A regional request for waiver is intended to seek approval for jurisdictions that will transition to 800 MHz spectrum, as a participant in the new PCWIN regional voice radio system, avoid unnecessary narrowbanding activities and cost. This process does not guarantee that a waiver will be granted. You are advised to plan a process that will enable your compliance with the narrowbanding requirement. Your process should include a determination of how narrowbanding will affect your system, a compliance plan, schedule and budget appropriation. A list of manufacturers and narrowband-compliant equipment is available at <http://psc.apcointl.org/2010/01/01/narrowbanding/>.

In accordance with the July 13, 2011, FCC Public Notice regarding guidance for submission of requests for waiver, this questionnaire is being distributed to gather information from agencies, to determine their commitment to participate in the PCWIN system, and to identify those interested in participating in a regional request for waiver.

The content of this questionnaire has been developed to satisfy the specific application requirements established by the FCC. A full and complete response is needed to determine your interest and eligibility to participate in a regional waiver request.

- 1) Do you wish to participate in a regional waiver request?  If NO, return the questionnaire.  
If YES, complete the questionnaire and return it.

- 2) What steps have you already taken to plan for, initiate, and complete the transition to narrowband operations?

Had an assessment done of our current equipment to see if narrowband capable.

- 3) Describe the size and complexity of your current system:

Mount Lemmon runs off one repeater, and is dispatched by Drexel Heights Fire.

- 4) Describe any system upgrades or improvements, in addition to narrowbanding, that are planned:

All our mobile and hand held radios are narrowband compatible. Our repeater is not, so we are in the process of pricing out a replacement.

- 5) If a waiver is granted, how will wideband operations after January 1, 2013, affect neighboring systems, interoperability relationships, or other interdependencies?

No



**MOUNT LEMMON FIRE DISTRICT**

- 6) After migrating communications services from your UHF/VHF system to the PCWIN 800 MHz system, will you relinquish UHF/VHF spectrum?

No  (Please specify on the Frequency Worksheet which of your licenses will and will not be relinquished)

- 7) Describe your current equipment and whether it is narrowband-capable or must be replaced or upgraded. A list of manufacturers and narrowband-compliant equipment is available at <http://psc.apcointl.org/2010/01/01/narrowbanding/>.

**Base Stations/Repeaters:**

Base Stations/Repeaters:					Quantity	
Make:	Kenwood (base station)	Model:	TK 860 HG-1	Narrowband Capability	Upgrade Required	1
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		

**Mobile Radios:**

Make:	Kenwood	Model:	TK 7360 HV	Narrowband Capability	Upgrade Required	1
Make:	Kenwood	Model:	TK 7360 HU	Narrowband Capability	Upgrade Required	2
Make:	Kenwood	Model:	TK 8160 K	Narrowband Capability	Upgrade Required	1
Make:	Kenwood	Model:	TK 840 (N)	Narrowband Capability	Upgrade Required	3
Make:	Kenwood	Model:	TK 760	Narrowband Capability	Upgrade Required	1
Make:	Kenwood	Model:	Tk 830 G	Narrowband Capability	Upgrade Required	3
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		

**Portable Radios:**

Make:	Kenwood	Model:	TK 380	Narrowband Capability	Upgrade Required	12
Make:	Kenwood	Model:	TK 280	Narrowband Capability	Upgrade Required	1
Make:	Kenwood	Model:	TK 390	Narrowband Capability	Upgrade Required	2
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		

**Voters:**

Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		
Make:		Model:		Narrowband Capability		

- 8) If a regional waiver request is denied, what funding source will you use to achieve compliance? Describe your budgeting process; does your budget require government approval or a multi-year budget process?

Budgetary Need: \$

Enter the rough order magnitude cost to replace/upgrade equipment.



MOUNT LEMMON FIRE DISTRICT

9) Is your agency committed to migrating your voice communications to the PCWIN regional communications system?

10) Does your agency designate Pima County to take the lead on the regional waiver request on your behalf?

11) Points of Contact

Person completing this questionnaire:

Agency:	MLFD
Name:	Joseph A. Gunia
Telephone:	520.444.6279
E-Mail:	<a href="mailto:jgunia@mlfdaz.org">jgunia@mlfdaz.org</a>
Address:	P.O. Box 759
City, State:	Mount Lemmon, AZ
Zip Code:	85619

Point of contact for follow up questions:

MLFD
Joseph A. Gunia
520.444.6279
<a href="mailto:jgunia@mlfdaz.org">jgunia@mlfdaz.org</a>
P.O. Box 759
Mount Lemmon, AZ
85619

Additional information is required on the Frequency Worksheet. Please describe how each frequency is used, and whether or not it will be relinquished after transitioning to the PCWIN system.

Direct any questions about the Pima County regional narrowbanding waiver request to Larry Sayers at [Larry.Sayers@pima.gov](mailto:Larry.Sayers@pima.gov) or (520) 400-7115.

Return completed questionnaires and Frequency Worksheets to:

Pima County Wireless Integrated Network  
Regional Narrowbanding Waiver Request  
33 N. Stone Avenue, Suite 1810  
Tucson, AZ 85701

or by e-mail to [Catherine.Hanna@pima.gov](mailto:Catherine.Hanna@pima.gov)



[illegible]



MOUNT LEMMON FD	WYNNB651	1		MOUNT	TUCSON	32	24	54.3	110	42	58.3			2989		24	Repetitive	1	:400 00000	100	000	Voice	No
MOUNT LEMMON FD	WYNNB651	3															Mobio	25	:405 00000	25		Voice	No
MOUNT LEMMON FD	WYNNB651	3															Mobio	15	:400 03755	2		Voice	No
MOUNT LEMMON FD	WYNNB651	3															Mobio	25	:400 00000	25		Voice	No
MOUNT LEMMON FD	WYNNB651	3															Mobio	15	:400 58375	2		Voice	No



# City of South Tucson Police & Fire Departments

- Cover Letters
- UHF/VHF Narrowbanding  
Questionnaire
- FCC Radio Frequency  
Information



MAYOR  
JENNIFER ECKSTROM

CHIEF OF POLICE  
RICHARD E. MUÑOZ

CITY MANAGER  
ENRIQUE G. SERNA



## POLICE DEPARTMENT

1601 SOUTH SIXTH AVENUE  
SOUTH TUCSON, ARIZONA 85713

December 27, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Waiver request for temporary extension of deadline to narrowband existing VHF/UHF radio systems

The City of South Tucson respectfully requests a waiver of FCC Rule Section 90.203(j) to be authorized a temporary extension of time to continue wideband operations on existing VHF and UHF radio systems. The City of South Tucson is part of a regional coordination plan and filing this request as one partner of the Pima County Wireless Integrated Network (PCWIN) coordinated waiver request. The amount of time for which a waiver is requested is no more than reasonably necessary to complete the move to the new regional 800 MHz PCWIN system.

By participating in the PCWIN project, the City of South Tucson has committed to replacing its legacy VHF and UHF radio systems. Therefore, our police and fire department is dependent on the project schedule and has no other reasonable alternative or additional resources to address narrowbanding for its legacy VHF/UHF systems. In view of the circumstances of this case, application of the narrowbanding rule would be unduly burdensome and contrary to the public interest. We believe a grant of this waiver request would be in the public interest since the intent of the PCWIN Project is to replace legacy systems with a single regional interoperable 800 MHz voice radio system, thereby satisfying the underlying purpose of the narrowbanding rule by promoting consolidation and spectrum efficiency.

Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until our police and fire department is fully transitioned to the regional 800 MHz PCWIN system. If you have any questions or require additional information regarding this request, please feel free to contact me at (520) 917-1580.

Sincerely,

Chief Richard Muñoz  
South Tucson Police Department

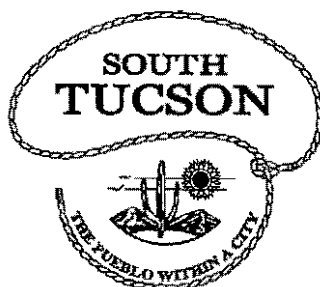
cc: File



MAYOR  
JENNIFER ECKSTROM

VICE MAYOR  
PETE TADEO

COUNCIL MEMBERS  
JOHN FELIX, ACTING MAYOR  
PAUL S. DIAZ  
ANITA ROMERO  
CARLOS G. SALAZ  
MARY H. SOLTERO



1601 SOUTH SIXTH AVENUE  
SOUTH TUCSON, ARIZONA 85713  
(520) 792-2424  
FAX (520) 628-9619

CITY MANAGER  
ENRIQUE G. SERNA

December 27, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Waiver request for temporary extension of deadline to narrowband existing VHF/UHF radio systems

The City of South Tucson respectfully requests a waiver of FCC Rule Section 90.203(j) to be authorized a temporary extension of time to continue wideband operations on existing VHF and UHF radio systems. The City of South Tucson is part of a regional coordination plan and filing this request as one partner of the Pima County Wireless Integrated Network (PCWIN) coordinated waiver request. The amount of time for which a waiver is requested is no more than reasonably necessary to complete the move to the new regional 800 MHz PCWIN system.

By participating in the PCWIN project, the City of South Tucson has committed to replacing its legacy VHF and UHF radio systems. Therefore, our police and fire department is dependent on the project schedule and has no other reasonable alternative or additional resources to address narrowbanding for its legacy VHF/UHF systems. In view of the circumstances of this case, application of the narrowbanding rule would be unduly burdensome and contrary to the public interest. We believe a grant of this waiver request would be in the public interest since the intent of the PCWIN Project is to replace legacy systems with a single regional interoperable 800 MHz voice radio system, thereby satisfying the underlying purpose of the narrowbanding rule by promoting consolidation and spectrum efficiency.

Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until our police and fire department is fully transitioned to the regional 800 MHz PCWIN system. If you have any questions or require additional information regarding this request, please feel free to contact me at (520) 917-1561

Sincerely,

Chief Larry Anderson  
South Tucson Fire Department



### UHF/VHF Narrowbanding Questionnaire

The Federal Communications Commission (FCC) has set January 1, 2013 as the deadline for all VHF and UHF Public Safety and Industrial/Business land mobile radio (LMR) systems in the 150-174 MHz and 421-512 MHz bands to migrate from 25 kHz channel bandwidth to 12.5 kHz or narrower technology. After January 1, 2013, licensees not operating at 12.5 kHz efficiency will be in violation of the FCC's rules and could be subject to FCC enforcement action, which may include admonishment, monetary fines, or loss of license.

Information about narrowbanding benefits, frequently asked questions, links to information and resources and other relevant information may be obtained at [www.fcc.gov/narrowbanding](http://www.fcc.gov/narrowbanding). Narrowbanding related questions may be submitted to the FCC at [narrowbanding@fcc.gov](mailto:narrowbanding@fcc.gov).

The PCWIN Executive Management Committee has directed PCWIN staff to prepare a regional request for waiver to defer the need to narrowband frequencies and equipment for those agencies that will abandon the use of UHF/VHF spectrum licenses and equipment after PCWIN systems are cutover; currently scheduled for first quarter of calendar year 2014. ***If your agency will continue to operate on your UHF/VHF licenses after PCWIN cutover, you are required to narrowband your solutions prior to the January 1, 2013 deadline.*** A regional request for waiver is intended to seek approval for jurisdictions that will transition to 800 MHz spectrum, as a participant in the new PCWIN regional voice radio system, avoid unnecessary narrowbanding activities and cost. This process does not guarantee that a waiver will be granted. You are advised to plan a process that will enable your compliance with the narrowbanding requirement. Your process should include a determination of how narrowbanding will affect your system, a compliance plan, schedule and budget appropriation. A list of manufacturers and narrowband-compliant equipment is available at <http://psc.apcointl.org/2010/01/01/narrowbanding/>.

In accordance with the July 13, 2011, FCC Public Notice regarding guidance for submission of requests for waiver, this questionnaire is being distributed to gather information from agencies, to determine their commitment to participate in the PCWIN system, and to identify those interested in participating in a regional request for waiver.

The content of this questionnaire has been developed to satisfy the specific application requirements established by the FCC. A full and complete response is needed to determine your interest and eligibility to participate in a regional waiver request.

- 1) Do you wish to participate in a regional waiver request?  If NO, return the questionnaire.  
If YES, complete the questionnaire and return it.
- 2) What steps have you already taken to plan for, initiate, and complete the transition to narrowband operations?  
We are contracted with the City of Tucson Police Department for dispatch services. This contract includes communications equipment repair and support, and since July 1, 2010 have been operating on their frequencies.
- 3) Describe the size and complexity of your current system:  
Our agency has outdated dispatcher terminals, and there are no plans to upgrade this equipment. We have a police fleet of which 25 vehicles are equipped with mobile radios. We also currently have 35 HT-1000 portable radios but only have a need for 25 handheld radios.
- 4) Describe any system upgrades or improvements, in addition to narrowbanding, that are planned:  
We have contracted with the City of Tucson Police Department for dispatch services and plan to follow their recommendations for upgrades and improvements.
- 5) If a waiver is granted, how will wideband operations after January 1, 2013, affect neighboring systems, interoperability relationships, or other interdependencies?  
We have no plans to re-establish a communications dispatch center. Since we are completely surrounded by the City of Tucson we rely on the Tucson Police Department for dispatch services so there should be no effect. The interoperability and interdependencies are almost as though we are part of the same agency.
- 6) After migrating communications services from your UHF/VHF system to the PCWIN 800 MHz system, will you relinquish UHF/VHF spectrum?  
 (Please specify on the Frequency Worksheet which of your licenses will and will not be relinquished)



**SOUTH TUCSON POLICE DEPARTMENT and SOUTH TUCSON FIRE DEPARTMENT**

7) Describe your current equipment and whether it is narrowband-capable or must be replaced or upgraded. A list of manufacturers and narrowband-compliant equipment is available at <http://psc.apcointl.org/2010/01/01/narrowbanding/>.

**Base Stations/Repeaters:**

			<b>Quantity</b>
Make:	Model:	Narrowband Capability:	
Make:	Model:	Narrowband Capability:	
Make:	Model:	Narrowband Capability:	
Make:	Model:	Narrowband Capability:	
Make:	Model:	Narrowband Capability:	

**Mobile Radios:**

Make:	Motorola	Model:	M1225	Narrowband Capability:	Replacement Required	16
Make:	Motorola	Model:	CDM1250	Narrowband Capability:	Replacement Required	12
Make:	Kenwood	Model:	TK-790	Narrowband Capability:	Replacement Required	1
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		

**Portable Radios:**

Make:	Motorola	Model:	HT-1000	Narrowband Capability:	Replacement Required	35
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		

**Voters:**

Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		



**SOUTH TUCSON POLICE DEPARTMENT and SOUTH TUCSON FIRE DEPARTMENT**

- 8) If a regional waiver request is denied, what funding source will you use to achieve compliance? Describe your budgeting process; does your budget require government approval or a multi-year budget process?

We would rely on R.I.C.O. funds for the most part.

Budgetary Needs: \$ 350,000.00

Enter the rough order magnitude cost to replace/upgrade equipment.

- 9) Is your agency committed to migrating your voice communications to the PCWIN regional communications system?

- 10) Does your agency designate Pima County to take the lead on the regional waiver request on your behalf?

- 11) Points of Contact

**Person completing this questionnaire:**

**Point of contact for follow up questions:**

Agency: City of South Tucson Police Department  
 Name: Richard E. Munoz  
 Telephone: 520-917-1580  
 E-Mail: [Rmunoz@southtucson.org](mailto:Rmunoz@southtucson.org)  
 Address: 1601 S. 6th Avenue  
 City, State: South Tucson, Arizona  
 Zip Code: 85713

City of South Tucson Police Department  
 Lt. Jeff Inorio  
 520-917-1582  
[Jinorio@southtucson.org](mailto:Jinorio@southtucson.org)  
 1601 S. 6th Avenue  
 South Tucson, Arizona  
 85713

Additional information is required on the Frequency Worksheet. Please describe how each frequency is used, and whether or not it will be relinquished after transitioning to the PCWIN system.

Direct any questions about the Pima County regional narrowbanding waiver request to  
 Larry Sayers at [Larry.Sayers@pima.gov](mailto:Larry.Sayers@pima.gov) or (520) 400-7115.

Return completed questionnaires and Frequency Worksheets to:

Pima County Wireless Integrated Network  
 Regional Narrowbanding Waiver Request  
 33 N. Stone Avenue, Suite 1810  
 Tucson, AZ 85701

or by e-mail to [Catherine.Hanna@pima.gov](mailto:Catherine.Hanna@pima.gov)



# CITY OF SOUTH TUCSON FCC RADIO FREQUENCIES

Entity Name	Call Sign	Location Number	Location Name	Address	City	Lat Deg	Lat Min	Lat Sec	Long Deg	Long Min	Long Sec	ASR No.	Elev (meters)	Struct Height (meters)	Antenna Ht @ Tip (meters)	Station Type	No. of Units	Freq MHz	Power Out	ERP	Supports Voice Data, or Other Communications	Frequency Re-Allocated After Cancellation
SOUTH TUCSON, CITY OF	WVAZ711	1		1601 S. SURIWAY	SOUTH TUCSON		31	12	7.1	110	58	4.1		279	30	37 METERS	MOBILE	1	154.2100	50	12.5 Voice	Yes
SOUTH TUCSON, CITY OF	WVAZ711	2		1601 S. SURIWAY	SOUTH TUCSON											MOBILE	30	154.6200	50		Voice	Yes
SOUTH TUCSON, CITY OF	WVAZ711	2		1601 S. SURIWAY	SOUTH TUCSON											MOBILE	30	154.2100	50		Voice	Yes



# City of Tucson Police & Fire Departments

- Cover Letters
- UHF/VHF Narrowbanding  
Questionnaire
- FCC Radio Frequency  
Information





Ready to Protect, Proud to Serve

tel: 520-791-4441  
fax: 520-791-5491  
www.ci.tucson.az.us/police/  
270 S. Stone Avenue  
Tucson, Arizona 85701-1917

January 3, 2012

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Waiver request for temporary extension of deadline to narrowband existing VHF/UHF radio systems

To Whom It May Concern:

The City of Tucson respectfully requests a waiver of FCC Rule Section 90.203(j) be authorized, requesting a temporary extension of time to continue wideband operations on existing VHF and UHF radio systems. The City is part of a regional coordination plan and is filing this request as one partner of the Pima County Wireless Integrated Network (PCWIN) coordinated waiver request. The amount of time for which a waiver is requested is no more than reasonably necessary to complete the move to the new regional 800 MHz PCWIN system.

By participating in the PCWIN project, the City of Tucson has committed to replacing its legacy VHF and UHF radio systems. Therefore, the City is dependent on the project schedule and has no other reasonable alternative or additional resources to address narrowbanding for its legacy VHF/UHF systems. In view of the circumstances of this case, application of the narrowbanding rule would be unduly burdensome and contrary to the public interest. We believe a grant of this waiver request would be in the public interest since the intent of the PCWIN Project is to replace legacy systems with a single regional interoperable 800 MHz voice radio system, thereby satisfying the underlying purpose of the narrowbanding rule by promoting consolidation and spectrum efficiency.

Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until the City is fully transitioned to the regional 800 MHz PCWIN system. If you have any questions or require additional information regarding this request, please feel free to contact me at (520) 791-4441.

Sincerely,

Roberto A. Villaseñor  
Chief of Police

RAV:JJ:kr





CITY OF  
TUCSON

December 28, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

**Re:** Waiver request for temporary extension of deadline to narrowband  
existing VHF/UHF radio systems

The City of Tucson respectfully requests a waiver of FCC Rule Section 90.203(j) to be authorized a temporary extension of time to continue wideband operations on existing VHF and UHF radio systems. The City is part of a regional coordination plan and is filing this request as one partner of the Pima County Wireless Integrated Network (PCWIN) coordinated waiver request. The amount of time for which a waiver is requested is no more than reasonably necessary to complete the move to the new regional 800 MHz PCWIN system.

By participating in the PCWIN project, the City of Tucson has committed to replacing its legacy VHF and UHF radio systems. Therefore, the City is dependent on the project schedule and has no other reasonable alternative or additional resources to address narrowbanding for its legacy VHF/UHF systems. In view of the circumstances of this case, application of the narrowbanding rule would be unduly burdensome and contrary to the public interest. We believe a grant of this waiver request would be in the public interest since the intent of the PCWIN Project is to replace legacy systems with a single regional interoperable 800 MHz voice radio system, thereby satisfying the underlying purpose of the narrowbanding rule by promoting consolidation and spectrum efficiency.

Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until the City is fully transitioned to the regional 800 MHz PCWIN system. If you have any questions or require additional information regarding this request, please feel free to contact me at (520)837-7009.

Sincerely,

Jim Critchley  
Fire Chief  
Tucson Fire Department



P.O. Box 27210 • TUCSON, AZ 85726-7210  
(520) 791-4512 • FAX (520) 791-3231  
[www.cityoftucson.org](http://www.cityoftucson.org)



## UHF/VHF Narrowbanding Questionnaire

The Federal Communications Commission (FCC) has set January 1, 2013 as the deadline for all VHF and UHF Public Safety and Industrial/Business land mobile radio (LMR) systems in the 150-174 MHz and 421-512 MHz bands to migrate from 25 kHz channel bandwidth to 12.5 kHz or narrower technology. After January 1, 2013, licensees not operating at 12.5 kHz efficiency will be in violation of the FCC's rules and could be subject to FCC enforcement action, which may include admonishment, monetary fines, or loss of license.

Information about narrowbanding benefits, frequently asked questions, links to information and resources and other relevant information may be obtained at [www.fcc.gov/narrowbanding](http://www.fcc.gov/narrowbanding). Narrowbanding related questions may be submitted to the FCC at [narrowbanding@fcc.gov](mailto:narrowbanding@fcc.gov).

The PCWIN Executive Management Committee has directed PCWIN staff to prepare a regional request for waiver to defer the need to narrowband frequencies and equipment for those agencies that will abandon the use of UHF/VHF spectrum licenses and equipment after PCWIN systems are cutover; currently scheduled for first quarter of calendar year 2014. *If your agency will continue to operate on your UHF/VHF licenses after PCWIN cutover, you are required to narrowband your solutions prior to the January 1, 2013 deadline.* A regional request for waiver is intended to seek approval for jurisdictions that will transition to 800 MHz spectrum, as a participant in the new PCWIN regional voice radio system, avoid unnecessary narrowbanding activities and cost. This process does not guarantee that a waiver will be granted. You are advised to plan a process that will enable your compliance with the narrowbanding requirement. Your process should include a determination of how narrowbanding will affect your system, a compliance plan, schedule and budget appropriation. A list of manufacturers and narrowband-compliant equipment is available at <http://psc.apcointl.org/2010/01/01/narrowbanding/>.

In accordance with the July 13, 2011, FCC Public Notice regarding guidance for submission of requests for waiver, this questionnaire is being distributed to gather information from agencies, to determine their commitment to participate in the PCWIN system, and to identify those interested in participating in a regional request for waiver.

The content of this questionnaire has been developed to satisfy the specific application requirements established by the FCC. A full and complete response is needed to determine your interest and eligibility to participate in a regional waiver request.

- 1) Do you wish to participate in a regional waiver request?  If NO, return the questionnaire.  
If YES, complete the questionnaire and return it.
- 2) What steps have you already taken to plan for, initiate, and complete the transition to narrowband operations?  

Tucson Fire has programmed all portable radios with narrowband UHF AIRS channels. No other steps have been taken to modify the existing conventional radio system for fire or MEDS operation. Tucson Police is in the process of programming the AIRS frequencies on their radios.
- 3) Describe the size and complexity of your current system:  

The City of Tucson Fire Department currently uses a conventional UHF radio system. The Tucson Police Department currently uses a conventional VHF radio system. Each frequency has a single transmitter site with a backup transmitter location and up to 12 voter/receiver sites that blanket the City's radio coverage area. There are eight repeated channels and two simplex channels for a total of 10 UHF frequencies for Tucson Fire and 13 repeated channels and five simplex channels for for a total of 18 VHF frequencies for Tucson Police.
- 4) Describe any system upgrades or improvements, in addition to narrowbanding, that are planned:  

No radio system upgrades or improvements are planned for City of Tucson Fire Department or Police Department other than adding narrowband AIRS channels to portable radios. The Tucson Fire Department and the Tucson Police Department plan to transition to the PCWIN radio system.
- 5) If a waiver is granted, how will wideband operations after January 1, 2013, affect neighboring systems, interoperability relationships, or other interdependencies?  

If the waiver is granted we do not foresee a negative impact on operations with neighboring systems. Tucson Fire and Tucson Police will have portable radios with narrowband AIRS channels for interoperability until PCWIN becomes operational in 2014.
- 6) After migrating communications services from your UHF/VHF system to the PCWIN 800 MHz system, will you relinquish UHF/VHF spectrum?  

(Please specify on the Frequency Worksheet which of your licenses will and will not be relinquished)



**TUCSON FIRE DEPARTMENT and TUCSON POLICE DEPARTMENT**

7) Describe your current equipment and whether it is narrowband-capable or must be replaced or upgraded. A list of manufacturers and narrowband-compliant equipment is available at <http://psc.apcointl.org/2010/01/01/narrowbanding/>.

**Base Stations/Repeaters:**

Make:	Model:	Narrowband Capability:	Quantity
General Electric	Mastr II (Fire)	Replacement Required	14
General Electric	Mastr II (TPD)	Replacement Required	12
Motorola	Quantar	Narrowband Capable	8

**Mobile Radios:**

Motorola	Radius M1225(TPD)	Narrowband Capable	388
Motorola	CM 300(TPD)	Narrowband Capable	160
Motorola	XTL 5000(TPD)	Narrowband Capable	35
Midland	XTR 70-1440B(TPD)	Replacement Required	34
Motorola	Radius M1225(TFD)	Narrowband Capable	71
Motorola	CM 300(TFD)	Narrowband Capable	53
Motorola	MCX 100(TFD)	Replacement Required	21

**Portable Radios:**

Motorola	XTS 5000(TFD)	Narrowband Capable	212
Motorola	XTS 3000(TFD)	Narrowband Capable	41
Motorola	HT 1000(TFD)	Narrowband Capable	19
Motorola	MT 1000(TFD)	Replacement Required	15
Motorola	HT 1000(TPD)	Narrowband Capable	1212
Motorola	XTS 3000(TPD)	Narrowband Capable	189
Motorola	MT 1500(TPD)	Narrowband Capable	107
Motorola	XTS 2500(TPD)	Narrowband Capable	33

**Voters:**

General Electric		Replacement Required	
Motorola	Astrotac 3000	Narrowband Capable	



**TUCSON FIRE DEPARTMENT and TUCSON POLICE DEPARTMENT**

- 8) If a regional waiver request is denied, what funding source will you use to achieve compliance? Describe your budgeting process; does your budget require government approval or a multi-year budget process?

There is no funding source assigned for UHF/VHF radio system replacement/modification. The budget will need to come from general operating funds which will affect services already funded.

Budgetary Needs: \$ 1,700,000.00

Enter the rough order magnitude cost to replace/upgrade equipment.

- 9) Is your agency committed to migrating your voice communications to the PCWIN regional communications system? ☐

- 10) Does your agency designate Pima County to take the lead on the regional waiver request on your behalf? ☒ Yes

- 11) Points of Contact

**Person completing this questionnaire:**

Agency:	City of Tucson, Information Technology
Name:	Joseph Jakoby
Telephone:	(520) 837-6054
E-Mail:	<a href="mailto:joe.jakoby@tucsonaz.gov">joe.jakoby@tucsonaz.gov</a>
Address:	481 W. Paseo Redondo
City, State:	Tucson, AZ
Zip Code:	85701

**Point of contact for follow up questions:**

City of Tucson, Fire Department
Chief Jim Critchley
(520) 837-7018
<a href="mailto:Jim.Critchley@tucsonaz.gov">Jim.Critchley@tucsonaz.gov</a>
300 S. Fire Central Place
Tucson, AZ
85701

Additional information is required on the Frequency Worksheet. Please describe how each frequency is used, and whether or not it will be relinquished after transitioning to the PCWIN system.

Direct any questions about the Pima County regional narrowbanding waiver request to Larry Sayers at [Larry.Sayers@pima.gov](mailto:Larry.Sayers@pima.gov) or (520) 400-7115.

Return completed questionnaires and Frequency Worksheets to:

Pima County Wireless Integrated Network  
Regional Narrowbanding Waiver Request  
33 N. Stone Avenue, Suite 1810  
Tucson, AZ 85701

or by e-mail to [Catherine.Hanna@pima.gov](mailto:Catherine.Hanna@pima.gov)



10

10















TUCSON, CITY OF	WYD440	2	1100 S RANDOLPH WAY	TUCSON	32	12	29.3	110	55	18.3	760	5	12	Repeater	1	423 7750	100	200 Voice	Yes
TUCSON, CITY OF	WYD440	3												Mobile	60	458 7500	30	Voice	Yes
TUCSON, CITY OF	WYD440	3												Mobile	60	453 7750	30	Voice	Yes
TUCSON, CITY OF	WRG389	1	9.5 MI NE	TUCSON	32	21	40.3	110	55	12.3	1036	43	43	Repeater	1	453 6000	100	200 Voice	Yes
TUCSON, CITY OF	WRG389	2	4701 N SWAN	TUCSON	32	17	31.3	110	55	46.3	760		104	Standby Repeater	1	453 6000	100	400 Voice	Yes
TUCSON, CITY OF	WRG389	3													300	458 6000	30	30 Voice	Yes
TUCSON, CITY OF	WRG389	3													300	453 6000	30	30 Voice	Yes
TUCSON, CITY OF	WRG185	2	4004 S PARK	TUCSON	32	10	35.3	110	57	27.3	756		33	Base Station	1	154 2800	100	200 Voice	Yes
TUCSON, CITY OF	WRG185	3	1000 S RANDOLPH WAY	TUCSON	32	12	30.3	110	55	18.3	760		48	Base Station	1	154 2800	100	Voice	Yes
TUCSON, CITY OF	WRG185	4	9.5 MI NE	TUCSON	32	21	40.3	110	55	12.3	1036		7	Base Station	1	154 2800	100	Voice	Yes
TUCSON, CITY OF	WYB441	2	4004 S PARK	TUCSON	32	10	34.3	110	57	27.3	756		33	Repeater	1	151 2050	100	Voice	Yes
TUCSON, CITY OF	WYB441	3	1000 S RANDOLPH WAY	TUCSON	32	12	30.3	110	55	18.3	760		48	Repeater	1	151 2050	100	Voice	Yes
TUCSON, CITY OF	WYB441	4	9.5 MI NE	TUCSON	32	21	40.3	110	55	12.3	1036		30	Base Station	1	151 2050	100	Voice	Yes
TUCSON, CITY OF	WYD444	2	4004 S PARK	TUCSON	32	10	35.3	110	57	27.3	756		33	Base Station	1	154 1300	100	Voice	Yes
TUCSON, CITY OF	WYD444	3	1000 S RANDOLPH WAY	TUCSON	32	12	30.3	110	55	18.3	760		48	Base Station	1	154 1300	100	Voice	Yes
TUCSON, CITY OF	WYD444	4	9.5 MI NE	TUCSON	32	21	40.3	110	55	12.3	1036		33	Base Station	1	154 1300	100	Voice	Yes
TUCSON, CITY OF	WYR786	2	4004 S PARK	TUCSON	32	10	35.3	110	57	27.3	756		33	Repeater	1	453 6000	100	200 Voice	Yes
TUCSON, CITY OF	WYR786	3	1000 S RANDOLPH WAY	TUCSON	32	12	30.3	110	55	18.3	760		48	Repeater	1	453 6000	100	200 Voice	Yes
TUCSON, CITY OF	WYR786	4	9.5 MI NE	TUCSON	32	21	40.3	110	55	12.3	1036		9	Repeater	1	453 6000	100	600 Voice	Yes
TUCSON, CITY OF	WYR786	2	4004 S PARK	TUCSON	32	10	35.3	110	57	27.3	756		33	Base Station	1	453 3750	100	200 Voice	Yes
TUCSON, CITY OF	WYR786	3	1000 S RANDOLPH WAY	TUCSON	32	12	30.3	110	55	18.3	760		48	Base Station	1	453 3750	100	200 Voice	Yes
TUCSON, CITY OF	WYR786	4	9.5 MI NE	TUCSON	32	21	40.3	110	55	12.3	1036		15	Base Station	1	453 3750	100	200 Voice	Yes
TUCSON, CITY OF	WYV453	1	4004 S PARK AVE	TUCSON	32	10	35.3	110	57	27.3	756	31	33	Repeater	1	154 1150	100	200 Voice	Yes
TUCSON, CITY OF	WYV453	2	1000 S RANDOLPH WAY	TUCSON	32	12	30.3	110	55	18.3	761		48	Repeater	1	154 1150	100	200 Voice	Yes
TUCSON, CITY OF	WYV453	3	7800 N COBBLESTONE RD	TUCSON	32	20	41.3	110	55	3.3	1036	43	43	Repeater	1	155 6050	100	200 Voice	Yes
TUCSON, CITY OF	WYV453	3	7800 N COBBLESTONE RD	TUCSON	32	20	41.3	110	55	3.3	1036	43	43	Repeater	1	154 1150	100	200 Voice	Yes
TUCSON, CITY OF	WYV453	4	4701 N SWAN RD	TUCSON	32	17	28.3	110	53	44.3	780	104	104	Repeater	1	154 1150	100	200 Voice	Yes
TUCSON, CITY OF	WYV453	4	4701 N SWAN RD	TUCSON	32	17	28.3	110	53	44.3	780	104	104	Repeater	1	155 6050	100	200 Voice	Yes
TUCSON, CITY OF	WYV453	5												Mobile	30	158 6050	30	Voice	Yes
TUCSON, CITY OF	WYX314	1	9.5 MI NE	TUCSON	32	21	40.3	110	55	12.3	1036	43	43	Repeater	1	154 1550	100	200 Voice	Yes
TUCSON, CITY OF	WYX314	2	4701 N SWAN	TUCSON	32	17	28.3	110	53	44.3	780		104	Repeater	1	154 1550	100	450 Voice	Yes
TUCSON, CITY OF	WYX314	3												Mobile	100	158 1550	30	30 Voice	Yes



# Pima County Sheriff's Department

- Cover Letters
  - Ajo-Gibson Volunteer Fire Department
  - Why Fire District
- UHF/VHF Narrowbanding Questionnaire
- FCC Radio Frequency Information



# *Why Fire District*

*301 S. Sonoyta Way – Why, AZ. 85321-9613*

*520-387-7766 – Fax 520-387-4218*

[whyfire@tabletoptelephone.com](mailto:whyfire@tabletoptelephone.com)

02/14/12

To Whom It May Concern,

Why Fire District is requesting an extension of the deadline to narrowband our existing UHF/VHF wideband voice radio system; FCC Rule Section 90.203(j).

At this time we do not have the necessary equipment to comply with the FCC Rule change, and the expense of totally changing our existing radio communications system, not to mention the maintenance of the new equipment, is so overwhelming at this point that we, as an exceptionally small Arizona Fire District, are researching all possible ways of financing these changes.

The Why Fire District has committed to complying to the FCC changes for our VHF and UHF radio systems. However, our Fire District is financially unable to meet the current deadline and has no other reasonable alternative or additional resources to address narrowbanding for its existing VHF/UHF systems. In view of the circumstances of this case, application of the narrowbanding rule would be unduly burdensome and contrary to the public interest.

Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until our Fire District is able to fully transition to narrowband. If you have any questions or require additional information regarding this request, please feel free to contact me at (520) 387-7766.

Sincerely,  
Vern Denning  
Chief, Why Fire District





**Ajo-Gibson Volunteer Fire Department**  
**PO Box 909**  
**Ajo, AZ 85321**

To Whom it may Concern

Chief  
David Tibbitt

Ajo/Gibson Volunteer Fire Department is requesting an extension of the deadline to narrowband the existing UHF/VHF wideband voice radio system know as Pima County F3; FCC Rule Section 90.203(j).

Secretary  
KD Kelley

At this time we do not have the necessary equipment to comply with the FCC Rule change, and the expense of totally changing our existing radio communications system, not to mention the maintenance of the new equipment, is so overwhelming at this point that we, as an exceptionally small Arizona Fire Department, are researching all possible ways of financing these changes.

Captain  
Mark Coyle

Lieutenant  
JD Allen

Ajo/Gibson Volunteer Fire Department has committed to complying to the FCC changes for the UHF and VHF radio systems. However at this time unable to meet the current deadline and has no other reasonable alternative or additional resources to address narrowbanding for its existing VHF/UHF systems. In view of the circumstances of this case, application of the narrowbanding rule would be unduly burdensome and contrary to the public interest.

Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until our Fire Department is able to fully transition to narrowband. If you have any questions or require additional information regarding this request, please feel free to contact me at (602)399-9382

Chief David Tibbitt  
Ajo/Gibson Volunteer Fire Department



## UHF/VHF Narrowbanding Questionnaire

The Federal Communications Commission (FCC) has set January 1, 2013 as the deadline for all VHF and UHF Public Safety and Industrial/Business land mobile radio (LMR) systems in the 150-174 MHz and 421-512 MHz bands to migrate from 25 kHz channel bandwidth to 12.5 kHz or narrower technology. After January 1, 2013, licensees not operating at 12.5 kHz efficiency will be in violation of the FCC's rules and could be subject to FCC enforcement action, which may include admonishment, monetary fines, or loss of license.

Information about narrowbanding benefits, frequently asked questions, links to information and resources and other relevant information may be obtained at [www.fcc.gov/narrowbanding](http://www.fcc.gov/narrowbanding). Narrowbanding related questions may be submitted to the FCC at [narrowbanding@fcc.gov](mailto:narrowbanding@fcc.gov).

The PCWIN Executive Management Committee has directed PCWIN staff to prepare a regional request for waiver to defer the need to narrowband frequencies and equipment for those agencies that will abandon the use of UHF/VHF spectrum licenses and equipment after PCWIN systems are cutover; currently scheduled for first quarter of calendar year 2014. ***If your agency will continue to operate on your UHF/VHF licenses after PCWIN cutover, you are required to narrowband your solutions prior to the January 1, 2013 deadline.*** A regional request for waiver is intended to seek approval for jurisdictions that will transition to 800 MHz spectrum, as a participant in the new PCWIN regional voice radio system, avoid unnecessary narrowbanding activities and cost. This process does not guarantee that a waiver will be granted. You are advised to plan a process that will enable your compliance with the narrowbanding requirement. Your process should include a determination of how narrowbanding will affect your system, a compliance plan, schedule and budget appropriation. A list of manufacturers and narrowband-compliant equipment is available at <http://psc.apcointl.org/2010/01/01/narrowbanding/>.

In accordance with the July 13, 2011, FCC Public Notice regarding guidance for submission of requests for waiver, this questionnaire is being distributed to gather information from agencies, to determine their commitment to participate in the PCWIN system, and to identify those interested in participating in a regional request for waiver.

The content of this questionnaire has been developed to satisfy the specific application requirements established by the FCC. A full and complete response is needed to determine your interest and eligibility to participate in a regional waiver request.

1) Do you wish to participate in a regional waiver request?

☒ Yes

If NO, return the questionnaire.  
If YES, complete the questionnaire and return it.

2) What steps have you already taken to plan for, initiate, and complete the transition to narrowband operations?

The Pima County Sheriff's Department (PCSD) provides dispatch services for the Ajo-Gibson Volunteer Fire Department, Why Fire District and Ajo Ambulance via a VHF frequency licensed to Pima County. Both fire departments are small agencies in western Pima County lacking resources to narrowband their existing equipment or to provide PCSD with replacement equipment so we can continue to dispatch them. PCSD operates a GE MASTR II VHF repeater on Childs Mountain and a GE MASTR II base station in the dispatch center. Neither are narrowband capable. These agencies are participants in the Pima County Wireless Integrated Network Project, a regional public safety communications system project that will replace multiple legacy systems by July 2014, including those operated by these agencies. We seek a temporary waiver to provide time to transition services to the new regional radio system.

3) Describe the size and complexity of your current system:

VHF conventional system with one repeater on Childs Mountain, Ajo, Pima County, Arizona. The repeater serves approximately 40 end users. It provides voice and tone paging services to dispatch volunteer and part time fire and emergency medical responders.

4) Describe any system upgrades or improvements, in addition to narrowbanding, that are planned:

Pima County does not intend to upgrade or replace its equipment. By July 2014, the Pima County Wireless Integrated Network will go live and provide alternative communications capabilities.

5) If a waiver is granted, how will wideband operations after January 1, 2013, affect neighboring systems, interoperability relationships, or other interdependencies?

If the waiver is granted, PCSD will continue to dispatch for the fire and EMS responders in a small rural community in western Pima County. We will also continue to have interoperable communications with U.S. Customs and Border Protection, and the National Park Service until alternative services are available through completion of the PCWIN project.

6) After migrating communications services from your UHF/VHF system to the PCWIN 800 MHz system, will you relinquish UHF/VHF spectrum?

☐ No

(Please specify on the Frequency Worksheet which of your licenses will and will not be relinquished)



PIMA COUNTY

7) Describe your current equipment and whether it is narrowband-capable or must be replaced or upgraded. A list of manufacturers and narrowband-compliant equipment is available at <http://psc.apcointl.org/2010/01/01/narrowbanding/>

**Base Stations/Repeaters:**

Base Stations/Repeaters:					Quantity	
Make:	GE	Model:	MASTR II VHF	Narrowband Capability:	Replacement Required	1
Make:	GE	Model:	MASTR II VHF	Narrowband Capability:	Replacement Required	1
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		

**Mobile Radios:**

Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		

**Portable Radios:**

Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
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Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		

**Voters:**

Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		
Make:		Model:		Narrowband Capability:		



PIMA COUNTY

- 8) If a regional waiver request is denied, what funding source will you use to achieve compliance? Describe your budgeting process; does your budget require government approval or a multi-year budget process?

The fire and EMS providers will be required to replace County equipment or find an alternative dispatch agency. There are no local alternative dispatch agencies. The Why Fire District reports that approximately half of their mobile and portable radios are not narrowband capable and that they do not have the financial resources to replace the equipment.

Budgetary Needs: \$ 15,000.00

Enter the rough order magnitude cost to replace/upgrade equipment.

- 9) Is your agency committed to migrating your voice communications to the PCWIN regional communications system? ☒ Yes

- 10) Does your agency designate Pima County to take the lead on the regional waiver request on your behalf? ☒ Yes

11) Points of Contact

Person completing this questionnaire:

Agency: Pima County Sheriff's Department  
Name: Captain Paul Wilson  
Telephone: (520) 741-4878  
E-Mail: [Paul.Wilson@sheriff.pima.gov](mailto:Paul.Wilson@sheriff.pima.gov)  
Address: 1750 E. Benson Hwy  
City, State: Tucson, AZ  
Zip Code: 85714

Point of contact for follow up questions:

Pima County Sheriff's Department  
Captain Paul Wilson  
(520) 741-4878  
[Paul.Wilson@sheriff.pima.gov](mailto:Paul.Wilson@sheriff.pima.gov)  
1750 E. Benson Hwy  
Tucson, AZ  
85714

Additional information is required on the Frequency Worksheet. Please describe how each frequency is used, and whether or not it will be relinquished after transitioning to the PCWIN system.

Direct any questions about the Pima County regional narrowbanding waiver request to Larry Sayers at [Larry.Sayers@pima.gov](mailto:Larry.Sayers@pima.gov) or (520) 400-7115.

Return completed questionnaires and Frequency Worksheets to:

Pima County Wireless Integrated Network  
Regional Narrowbanding Waiver Request  
33 N. Stone Avenue, Suite 1810  
Tucson, AZ 85701

or by e-mail to [Larry.Sayers@pima.gov](mailto:Larry.Sayers@pima.gov)



# PIMA COUNTY FCC RADIO FREQUENCIES

Entity Name	Call Sign	Location Number	Location Name	Address	City	Lat Deg	Lat Min	Lat Sec	Lon Deg	Lon Min	Lon Sec	ASR No.	Elev M	Struct Height (meters)	Antenna Ht @ Tip (meters)	Station Type	No. of Units	Freq MHz	Pwr Out	ERP	Supports Voice, Data, or Other Communications	Will Frequency be Relinquished After Cutover to PCWIN? (Yes or No)
PIMA, COUNTY OF	KLU459	2		1259 WELL RD	AJO	32	22	56	112	51	56.6		524		15	Base Stat	1	155.4150	120	110	Voice	No
PIMA, COUNTY OF	KLU459	2		1259 WELL RD	AJO	32	22	56	112	51	56.6		524		15	Base Stat	1	155.7000	120	110	Voice	No
PIMA, COUNTY OF	KLU459	2		1259 WELL RD	AJO	32	22	56	112	51	56.6		524		15	Base Stat	1	155.6100	120	110	Voice	No
PIMA, COUNTY OF	KLU459	2		1259 WELL RD	AJO	32	22	56	112	51	56.6		524		15	Base Stat	1	155.4750	60	55	Voice	No
PIMA, COUNTY OF	KXV642	1		CHILDS MOUNTAIN	AJO	32	25	50	112	56	39.6		975		21	Base Stat	1	155.8950	120		Voice	No
PIMA, COUNTY OF	WY2441	3		CHILDS MTN	AJO	32	25	50	112	56	39.6		975		15	Repeater	1	155.0850	100	400	Voice	No



# **EXHIBIT D**





# Pima County Wireless Integrated Network

December 27, 2011

**Executive Management  
Committee:**

Clarence W. Dupnik, Chair  
Pima County Sheriff

Mike Hein  
Pima County Office of  
Emergency Management

Chief Roberto Villaseñor  
Tucson Police Department

Chief Daniel Sharp  
Oro Valley Police Department

Chief Joseph Delgado  
Tohono O'odham Tribal Police

Chief Anthony Daykin  
University of Arizona Police  
Department

Chief Jim Critchley  
Tucson Fire Department

Chief Jeff Piechura  
Northwest Fire District

Chief Doug Chappell  
Drexel Heights Fire District

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to  
Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The PCWIN Executive Management Committee encouraged the County to make this application. Some PCWIN participant agencies have counted on the implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the PCWIN radio network will not be completed by the January 2013 narrowbanding deadline. The PCWIN Executive Management Committee asks that the Federal Communications Commission grant Pima County's request to waive compliance requirements for the specific agencies detailed in the waiver request until July 1, 2014, so project participants can proceed with the implementation of the PCWIN regional voice radio system, and not bear the cost of narrowbanding outdated equipment, which will ultimately be replaced by our capital improvement project.

Our project and its participants continue to work diligently and in good faith to design and implement an interoperable network, giving our first responders the best technology and equipment to protect and serve the citizens of Pima County for years to come. Our project is complicated, but we are beginning to see the results of our hard work, and the hard work of those who support us in this effort. Voice and microwave radio contracts have been executed and the detail design for both technologies is complete. Site development is underway, and installation of equipment will begin in 2012.

**Pima County  
WINS!**



A 2004 Bond Project

Pima County Wireless Integrated Network Staff Office  
33 N. Stone, 18<sup>th</sup> Floor, Suite 1810 • Tucson, AZ 85701  
Mailstop: DT-BAB18-409

<http://www.bonds.pima.gov/Wireless/Index.html>



Thank you for your consideration in this request. If you have additional questions or concerns, please contact Captain Paul Wilson, PCWIN Project Administrator at (520)724-7200.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Clarence W. Dupnik". The signature is fluid and cursive, with a large initial "C" and a stylized "D".

Clarence W. Dupnik, Chairman  
Sheriff of Pima County

CWD/crh



# Avra Valley

15790 W. Silverbell Road  
Marana, AZ 85653-9577



# Fire District

Phone (520) 682-3255  
Fax (520) 682-5458

December 29, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C F R § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Avra Valley Fire District supports the Pima County Request for Waiver

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014 is reasonable. Pima County and its partners, including the Avra Valley Fire District, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Sincerely,

  
Fire Chief, Brian Delfs





# CORONA de TUCSON FIRE DEPT

99 E. Tallahassee Dr.  
Corona de Tucson, AZ 85641  
Administration Office (520) 762-5007  
Fax (520) 762-5992



December 27, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Corona de Tucson Fire Department supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Corona de Tucson Fire Department, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Bruce Whitehouse', is written over a horizontal line.

Fire Chief Bruce Whitehouse  
Corona de Tucson Fire Department



# *Drexel Heights Fire District*

5030 S. Camino Verde, Tucson, Arizona 85735-8971  
Phone: (520) 883-4341 Fax: (520) 883-3314  
www.drexelfire.net

*Board of Directors*  
James Bertrand, Chair  
Cheryl Cecil, Clerk  
Laura Dailey  
Charles Mendonca  
David Tornbom

*Fire Chief*  
Douglas Chappell

December 27, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Drexel Heights Fire District supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Drexel Heights Fire District, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,



Douglas E. Chappell, MPA, CFO  
Fire Chief / Administrator





ELEPHANT HEAD VOLUNTEER FIRE  
DEPARTMENT, INC.

January 3, 2012

December 27, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Elephant Head Volunteer Fire Department supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Elephant Head Volunteer Fire Department, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be "SH", is located below the "Respectfully Submitted," text.

Assistant Chief Steve Hulland  
Elephant Head Volunteer Fire Department





## **GOLDER RANCH FIRE DISTRICT**

Fire ♦ Rescue ♦ Medical  
3885 E. Golder Ranch Drive  
Tucson Arizona 85739  
(520) 825-9001 / FAX (520) 825-8043

Chief Randy Karrer



December 29, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Golder Ranch Fire District supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Golder Ranch Fire District, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Randy Karrer".

Chief Randy Karrer  
Golder Ranch Fire District





# NORTHWEST FIRE DISTRICT

SERVING RESIDENTS OF THE NORTHWEST FIRE DISTRICT, THE FLOWING WELLS  
COMMUNITY AND THE TOWN OF MARANA

ADMINISTRATION/LIFE SAFETY SERVICES  
5225 W. MASSINGALE RD.  
TUCSON AZ 85743



PHONE: (520) 887-1010 FAX: (520) 887-1034 [www.northwestfire.org](http://www.northwestfire.org)

December 27, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for  
Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Northwest Fire District supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Northwest Fire District, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrow banding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrow banding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

Chief Jeff Piechura  
Northwest Fire District







# PASCUA YAQUI TRIBE

## FIRE DEPARTMENT

### Pima County Wireless Integrated Network

December 27, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Pascua Pueblo Fire Department supports the Pima County Request for Waiver

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Pascua Pueblo Fire Department, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

#### Executive Management Committee:

Clarence W. Dupnik, Chair  
Pima County Sheriff

Mike Hein  
Pima County Office of  
Emergency Management

Chief Roberto Villaseñor  
Tucson Police Department

Chief Daniel Sharp  
Cerro Valley Police Department

Chief Joseph Delgado  
Tohono O'odham Tribal Police

Chief Anthony Dayton  
University of Arizona Police  
Department

Chief Jim Critchley  
Tucson Fire Department

Chief Jeff Piechura  
Northwest Fire District

Chief Doug Chappell  
Drexel Heights Fire District



inty



# PASCUA YAQUI TRIBE

## FIRE DEPARTMENT



Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Andre Matus". The signature is fluid and cursive, written over the printed name.

Chief Andre Matus  
Pascua Pueblo Fire Department





## Picture Rocks Fire District

12121 W. Picture Rocks Road

Tucson, AZ 85743-8773

Office (520) 682-7878 Fax (520) 682-0421

December 27, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Picture Rocks Fire District supports the Pima County Request for Waiver.

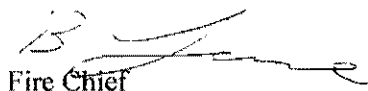
We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Picture Rocks Fire District, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Brett Lane



Fire Chief





**Pima County Office of Emergency Management and Homeland Security**  
33 N. Stone Avenue, Ste. 1490, Tucson AZ 85701  
(520) 798-0600 Office (520) 243-7550 Fax



December 27, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

**Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations**

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Pima County Office of Emergency Management and Homeland Security supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Pima County Office of Emergency Management and Homeland Security, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Mike Hein", with a stylized flourish at the end.

Director Mike Hein  
Pima County Office of Emergency Management and Homeland Security





Bus. (520) 647-3760  
Fax. (520) 647-7102

14550 E. Sands Ranch Road  
Vail, AZ. 85641

Emergency Telephone  
911

December 27, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Rincon Valley Fire District supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Rincon Valley Fire District, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Karen Lundberg".

Chief Karen Lundberg  
Rincon Valley Fire District





Edward Reina, Jr.  
Director

**TOHONO O'ODHAM NATION  
POLICE DEPARTMENT**

P.O. Box 189  
Sells, Arizona 85634  
(520) 383-3276 Sells Line  
(520) 622-1587 / 879-8900 Tucson Line  
1(866) 573-8673 Toll Free



Joseph F. Delgado  
Chief of Police

December 27, 2011

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Tohono O'odham Tribal Police Department supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Tohono O'odham Tribal Police Department, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

Joseph F. Delgado  
Chief of Police  
Tohono O'odham Nation



January 3, 2012

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the  
Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The University of Arizona Police Department supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the University of Arizona Police Department, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Sincerely,



Anthony Daykin  
Chief of Police